

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
GALVESTON DIVISION

VETERINARY SERVICES OF TEXAS, §  
LLC §  
§  
Plaintiff, §  
§  
VS. § CIVIL ACTION NO. 3:20-CV-230  
§  
ARTHUR J. GALLAGHER & CO. §  
(ILLINOIS) §  
§  
Defendant. §

**PLAINTIFF'S EXPERT DISCLOSURES**

To: Defendant, Arthur J. Gallagher & Co. (Illinois), through its attorneys of record, Deanne C. Ayers and Julie Tebbets, Ayers & Ayers, 4205 Gateway Dr., Suite 100, Colleyville, Texas 76034.

Plaintiff, Veterinary Services of Texas, PLLC, makes these expert disclosures as required by Federal Rule of Civil Procedure 26(a)(2).

1. Plaintiff may use the following person at trial to present evidence under Federal Rule of Evidence 702, 703, or 705:

- a. Jeffrey Barry
- b. The expert's address and telephone number is 4418 Broadway St., Pearland, TX 77581 and (281) 464-3384.

2. Plaintiff attaches a written report for each retained or specially employed expert. Each report is prepared and signed by the expert and contains the following:

- a. A complete statement of all opinions the expert will express and the basis and reasons for them.
- b. The data or other information considered by the expert in forming the opinions.
- c. Any exhibits that will be used to summarize or support the opinions.
- d. A curriculum vitae, résumé, or other listing of each expert's qualifications.
- e. A list of all publications authored by the expert in the previous ten years.
- f. A list of all other cases in which the expert testified as an expert at trial or by deposition during the previous four years.
- g. A statement of the compensation to be paid for the study and testimony in the case.

Respectfully submitted,

**MARK SMITH LAW, PLLC**

By: /s/ *J. Mark Smith*

J. Mark Smith  
Attorney in Charge  
Texas Bar No. 24010405  
2929 Allen Parkway  
Suite 3450  
Houston, TX 77019  
[mark@jmsmithlaw.com](mailto:mark@jmsmithlaw.com)  
(713) 237-1221 Main  
(832) 553-2856 Fax

**ATTORNEY IN CHARGE FOR  
PLAINTIFF**

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing document was served pursuant to the Federal Rules of Civil Procedure on all counsel of record on March 5, 2021.

By: /s/ *J. Mark Smith*

J. Mark Smith